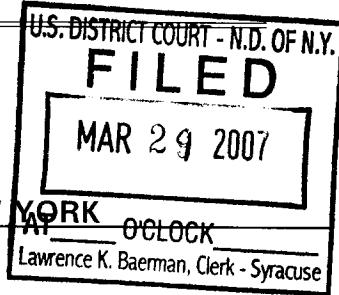


*United States District Court*

NORTHERN

DISTRICT OF

NEW YORK

AT 10 O'CLOCK

Lawrence K. Baerman, Clerk - Syracuse

UNITED STATES OF AMERICA

## CRIMINAL COMPLAINT

v.

**KEVIN J. GREEN**  
 (Name and Address of Defendant)

Case Number: 5:07-MJ-102 (GJD)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about March 22, 2007 in Onondaga County, in the Northern District of New York defendant did, (Track Statutory Language of Offense) by force or violence, or by intimidation, take from the person or presence of another, any property or money belonging to, or in the care, custody, control, management, or possession of, any bank or credit union

in violation of Title 18, United States Code, Section(s) 2113(a) & (d)

I further state that I am a(n) FBI Special Agent and that this complaint is based on the following facts:  
 Official Title

Continued on the attached sheet and made a part hereof:  YES  NO

Frederick E. Bragg  
 Signature of Complaint

Sworn to before me, and subscribed in my presence,

March 29, 2007

Date

at Syracuse, New York

City and State

Hon. Gustave J. DiBianco  
 United States Magistrate Judge  
 Name and Title of Judicial Officer

Signature of Judicial Officer

1  
2 NORTHERN DISTRICT OF NEW YORK  
3

SYRACUSE, NEW YORK

4 State of NEW YORK

5 County of ONONDAGA

6 AFFIDAVIT  
7

8 1. I, FREDERICK E. BRAGG, duly state that I am a Special  
9 Agent with the Federal Bureau of Investigation (FBI) assigned  
10 to the Syracuse Resident Agency. I have been so employed  
11 since July, 1991. My assignments include investigating  
12 violations of Federal Law, specifically violent criminal  
13 offenses.

14 2. I am the FBI case agent assigned to the robbery that  
15 occurred at the ACMG Federal Credit Union, 1753 Milton  
16 Avenue, Solvay, New York on March 22, 2007. The information  
17 provided in this affidavit is from personal knowledge and  
18 from information received from other law enforcement officers  
19 involved in this investigation.

20 3. On Thursday, March 22, 2007, at approximately 4:15 PM, an  
21 individual entered the ACMG Federal Credit Union, 1753 Milton  
22 Avenue, Solvay, New York, and entered the customer line. A  
23 few moments later, the subject approached a credit union  
24 teller and presented a note that was written on the back side  
25 of a check. The note read, "This is a robbery, give me the  
26 money." The subject then grabbed the right wrist of the  
27 victim teller. The subject then reached over the counter  
28 with his free hand and took currency from the teller's open

1 cash drawer. As he was grabbing the money, the subject  
2 stated, words to the effect of, "Give me those bills there."  
3 The subject then ran out of the credit union.

4 4. An audit conducted by credit union employees subsequent  
5 to the robbery revealed that the loss was \$850.00 in  
6 federally insured credit union funds.

7 5. The demand note utilized during this robbery was written  
8 on the back of a check in the name of Carol S. Green of  
9 Syracuse, New York.

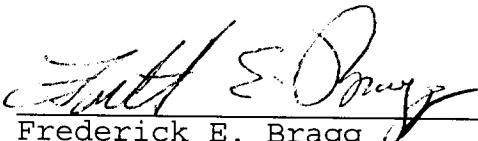
10 6. Carol S. Green's husband is Kevin J. Green, date of birth  
11 4/17/1961. A criminal history check of Kevin J. Green  
12 reveals numerous previous felony convictions in the State of  
13 New York, including a 2000 felony conviction for a robbery of  
14 a bank in the Town of Dewitt. Kevin S. Green fits the  
15 description provided by witnesses at the credit union.

16 7. A photographic spread containing Kevin J. Green was  
17 prepared by detectives of the Onondaga County Sheriff's  
18 Department (OCSD). This spread was individually shown to the  
19 victim teller as well as other witnesses at the credit union.  
20 All positively identified Kevin J. Green as the person  
21 responsible for the 4/22/2007 robbery of the ACMG Federal  
22 Credit Union in Solvay, New York.

23 8. On March 23, 2007, Kevin J. Green was contacted by OCSD  
24 Detectives. After being provided his Miranda warnings, Green  
25 admitted that he was responsible for the robbery of the ACMG  
26 Federal Credit Union on March 22, 2007. Green provided a  
27 voluntary affidavit regarding the incident.

28 9. The deposits of the ACMG Federal Credit Union are insured

1 by the National Credit Union Administration (NCUA).  
2  
3  
4

  
Frederick E. Bragg  
Special Agent  
Federal Bureau of Investigation  
Syracuse, New York

5 Subscribed and sworn to before me this 29<sup>th</sup> day of March,  
6  
7 2007

  
U.S. Magistrate

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